



California Regional Water Quality Control Board

Santa Ana Region



Linda S. Adams
Secretary for
Environmental Protection

3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 • FAX (951) 781-6288 • TDD (951) 782-3221
www.waterboards.ca.gov/santaana

Arnold Schwarzenegger
Governor

July 20, 2006

Mr. Darren Newton
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
7040 Trabuco Road
Irvine, CA 92618

COMMENTS ON DRAFT WORK PLAN FOR THE SUPPLEMENTAL INVESTIGATION AT IRP-6 AND THE MINGLED PLUMES AREA (MPA), FORMER MARINE CORPS AIR STATION, TUSTIN

Dear Mr. Newton:

We have completed our review of the above-referenced document, dated June 2006, which we received on July 5, 2006. The proposed activities are collection and analysis of groundwater samples for volatile organic compounds (VOCs) and installation of groundwater monitoring wells to define the extent of VOCs in the groundwater at sites IRP-6 and the MPA. Soil samples will also be collected at site IRP-6. We have the following comments:

1. Figure 3-5, TCE In Groundwater At the Mingled Plumes Area

Please check and correct the trichloroethylene (TCE) concentration shown for well CDS1MW02S on this figure. According to the Draft 2005 Annual Groundwater Monitoring Report for OU-1B and OU-4B, dated May 2006, the concentration of TCE detected in the water sample collected from well CDS1MW02S in December 2005 was 5.6 micrograms/liter ($\mu\text{g/l}$).

2. Attachment A, Sampling and Analysis Plan, Table 2-5, Estimated Method Reporting Limits and Expected Regulatory Criteria

Please add the California Department of Health Services (DHS) Maximum Contaminant Levels for Drinking Water to this table.

3. Mingled Plumes Area (MPA)

Based on Figure 1-7 of the Sampling and Analysis Plan, there are no groundwater monitoring wells to monitor the downgradient extent of the MPA. In 2003, groundwater samples were collected southeast of the downgradient groundwater monitoring well CDS1MW02S and TCE was detected at concentrations ranging from 0.32 $\mu\text{g/l}$ to 41 $\mu\text{g/l}$. We suggest that groundwater monitoring wells be installed to monitor the downgradient edge of the MPA.

California Environmental Protection Agency



Recycled Paper

4. Figure 1-7, Proposed Second WBZ HydroPunch Locations

See comment number 1

If you should have any questions, please call me at (951) 782-4498, or send e-mail to phannon@waterboards.ca.gov.

Sincerely,



Patricia A. Hannon
SLIC/DoD Section

cc via electronic copy: Mr. (Ram) Anantaraman Peddada, Dept. of Toxic Substances
Control
Mr. Jim Callian, Southwest Division, Naval Facilities
Engineering Command
Mr. James Ricks, U. S. EPA, Region IX